

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

CHRISTINE BORDEN,

Plaintiff,

v.

**BANK OF AMERICA, NA (“BANA”)
AND WESTCLIFF TECHNOLOGIES,
INC., D/B/A NATIONAL BITCOIN ATM,
AND CASH CLOUD, INC., D/B/A/ COIN
CLOUD,**

Defendants.

CASE NO.: 2:22-cv-04076-BHH

Removed from Georgetown County Court
of Common Pleas
Case No. 2022-CP-22-00868

LOCAL RULE 26.01 INTERROGATORIES

Defendant Westcliff Technologies, Inc., dba National Bitcoin ATM (hereinafter “Westcliff”), pursuant to the Local Rules of the United States District Court for the District of South Carolina, responds as follows to Local Rule 26.01 Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Westcliff is not aware of any person or legal entity with a subrogation interest in this action.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Although Plaintiff appears to have demanded a jury trial in the original Complaint, this defendant believes the matter should be tried non-jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent.

ANSWER: Westcliff is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: As alleged by Plaintiff, the alleged events giving rise to the Complaint occurred in and around Charleston County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

ANSWER: Westcliff is not aware of any cases related to this action.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or to the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Plaintiff should pursue her claims against the people who took her money without authorization: Valerie Key Turner and/or Albert Winters.

This 21st day of December, 2022

BEST LAW, P.A.

/s/ Tara E. Nauful

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Attorneys for Westcliff Technologies, Inc.

December 21, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2022, I caused a true and correct copy of the foregoing documents to be served on the parties below via the Court’s ECF filing system, as follows:

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